

**REMARKS/ARGUMENTS**

Claims 4-9 and 11 are pending in the application. Claim 11 is in condition for allowance.

Claims 4-9 are rejected under 35 U.S.C 112, first paragraph, as containing subject matter which was not described in the specification in such a way as to enable one skilled in the art to which it pertains, or with which it is most nearly connected, to make and/or use the invention.

Claims 4-7 and 9 are rejected under 35 U.S.C. 102(b) as being anticipated by the Vita Brochure.

Claim 8 would be allowable if rewritten to overcome the rejection(s) under 35 U.S.C. 112, first paragraph.

Claims 6, 7 and 8 are canceled without prejudice. Claims 12-25 are newly added.

Among other elements, claim 4 is amended such that the claim requires that the "spool support arms are vertically adjustable to accept varying tubing storage spool diameters." The element that "said second tubing injecting position injecting position positions said injector reel above said front end of said frame, and said coiled tubing exits said apparatus at an angle less than 90° to said surface" has been deleted. As presently drafted, claim 4 overcomes the rejection under 35 U.S.C 112, first paragraph as well as under 35 U.S.C. 102(b). All of the other claims depend either directly or indirectly from claim 4.

For these reasons it is submitted that this application is condition for allowance. If there are any question, call the undersigned at the telephone number indicated below.

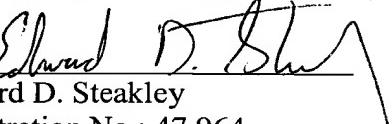
In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 06-2375, under Order No. HO-P02233US0 from which the

undersigned is authorized to draw.

Dated: June 18, 2003

Respectfully submitted,

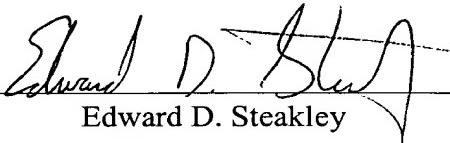
By   
Edward D. Steakley  
Registration No.: 47,964  
FULBRIGHT & JAWORSKI L.L.P.  
1301 McKinney, Suite 5100  
Houston, Texas 77010-3095  
(713) 651-5423  
(713) 651-5246 (Fax)  
Attorneys for Applicant

2010 RELEASE UNDER E.O. 14176

**CERTIFICATE OF SERVICE**

I do hereby certify that a copy of the Response to Office Action, in a manner provided in 37 CFR 1.248, is being deposited with the United States Postal Service on June 18, 2003, addressed to:

Cynthia G. Seal  
2925 Briarpark, Suite 930  
Houston, Texas 77042



Edward D. Steakley

2025 RELEASE UNDER E.O. 14176